

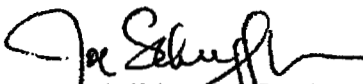
**B444-A-000009**

the start of work covered by the CDD. Additionally, if not already included in the IWCP/engineering work package, detailed drawings and/or photographs of the portion of the unit being removed must be provided for Division review at least seven (7) calendar days prior to conducting the work. These drawings/photographs must provide enough detail to describe the boundaries of the portion of the unit being removed.

2. Residual liquids encountered in the unit and liquids resulting from the closure activities must be managed appropriately as process waste and must not be sent to Building 891 for treatment as indicated in Section 3.0 of the CDD. Building 891 is authorized to manage remediation waste, but is not authorized to manage process wastes.
3. Since the CDD also describes non-RCRA decommissioning work (i.e., removal of cabinets and counter tops, disconnection of various plant systems) regulated under the Rocky Flats Cleanup Agreement (RFCA), these activities must be coordinated with Division staff according to the consultative process described in the Decommissioning Program Plan (DPP).
4. Since the portion of Unit 40 contained within Building 444/447 will likely be closed by removing sections under separate work plans that will be coordinated with the D&D schedule for the building, the 180-day limit for completing closure activities per Section B.4.b of the approved *RCRA Closure Plan for Interim Status Units at RFETS* is waived. Closure of the portion of Unit 40 described in this CDD must be scheduled and conducted according to the Integrated Sitewide Baseline. Additionally, a unit-specific closure schedule must be provided to the Division in accordance with Section B.5.d at least seven (7) calendar days prior to the start of closure activities. The unit-specific closure schedule must show how this closure work is integrated with the overall project to decommission and demolish Building 444/447. It is expected that the Division will be notified of any significant changes to the unit-specific closure schedule according to the RFCA consultative process.

If you have any questions concerning this matter, please contact James Hindman at (303) 692-3345.

Sincerely,



Joe Schieffelin, Unit Leader  
Hazardous Waste Compliance Unit  
Federal Facilities Program

cc: S. MacLeod, U.S. DOE-RFFO  
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